



Ontario Federation of Agriculture

Ontario AgriCentre

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September 15, 2016

Lisa M. Thompson, MPP
Room 425, Main Legislative Building, Queen's Park
Toronto, Ontario M7A 1A8
Fax: 416-325-3490

Dear Ms. Thompson,

Re: Bill 4, Supporting Agricultural Experts in their Field Act, 2016

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing 36,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system and rural communities with the potential to drive the Ontario economy forward.

In regards to your private member's bill, Bill 4, that was carried on first reading on September 13, 2016, we would like to offer the following comments.

The Bill makes various amendments to the Pesticides Act. It would add a definition of "professional pest advisor" to the Act. Under the definition, a person would be considered a professional pest advisor if he or she is a Certified Crop Advisor by the American Society of Agronomy with membership in the Ontario Certified Crop Advisor Association; or a Professional Agrologist under the Ontario Institute of Professional Agrologist Act, 2013 in the applicable field of practice; or has certain certifications or registrations; or if, in the opinion of the Director, the person has the necessary qualifications for the position, having regard to the person's level of education and professional experience. The Bill also adds a requirement for the Ministry to consult with interested professional pest advisors regarding how pest assessments should be conducted. The Ministry would then prepare a checklist, based on these consultations, to be followed when conducting pest assessments. The Bill also provides that when a soil inspection is conducted by a person who is supervised by a professional pest advisor, the professional pest advisor is not required to be present during the inspection.

OFA believes Bill 4 offers relief to our concern of having too few qualified agronomic consultants to conduct the required pest assessments. OFA raised this concern in its May 5th, 2015 submission in response to Amendments to O.Reg. 63/09. At that time, OFA stated that the current contingent of over 500 Certified Crop Advisors is likely insufficient to address the complex requirements of the proposed regulations. However, the regulatory disqualification, enabling only 100 to be qualified to act under the regulations ensures a shortage of qualified people to do the job. OFA questioned the basis upon which MOECC questions the integrity of consulting agronomists. Many engineers, accountants, dentists, lawyers and other certified professionals provide advice to clients, despite being employed by or affiliated with a larger firm.

If passed, Bill 4 will negate the amendment to the definition of “professional pest advisor” in subsection 8.2 (8) of the O.Reg. 63/09 set to take place on August 31, 2017 which would disqualify any person that “derives a financial benefit from a person who manufactures or sells a Class 12 pesticide or a pesticide that is used to treat a seed so that it becomes a Class 12 pesticide”.

Therefore OFA is in support of Bill 4 and believe it should receive the support of all MPPs in the legislature.

Sincerely,



Don McCabe
President

CC: Hon. Glen Murray, Minister, MOECC
Hon. Jeff Leal, Minister, OMAFRA
Mr. John Vanthof, MPP, Agriculture, Food and Rural Affairs Critic
OFA Board of Directors